

Robert T. Robbins, Esq.  
Nevada Bar No. 6109  
[rrobbins@robbinslawfirm.legal](mailto:rrobbins@robbinslawfirm.legal)  
Elizabeth B. Lowell, Esq.  
Nevada Bar No. 8551  
[elowell@robbinslawfirm.legal](mailto:elowell@robbinslawfirm.legal)  
**ROBBINS LAW FIRM**  
1995 Village Center Cir., Suite 190  
Las Vegas, NV 89134  
T: (702) 889-6665; F: (702) 889-6664  
*Counsel for Defendant Cactus Creek At  
Mountain's Edge Homeowners' Association, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BANK OF AMERICA, N.A., successor by  
merger to BAC HOME LOANS SERVICING,  
LP FKA COUNTRYWIDE HOME LOANS,

Plaintiff,

v.

CACTUS CREEK AT MOUNTAIN'S EDGE  
HOMEOWNERS' ASSOCIATION, INC.;  
PREMIER ONE HOLDINGS, INC.; and  
NEVADA ASSOCIATION SERVCIES, INC.,

Defendants.

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CACTUS CREEK AT MOUNTAIN'S EDGE  
HOMEOWNERS' ASSOCIATION, INC.,

Cross-Claimant,

v.

NEVADA ASSOCIATION SERVCIES, INC.,

Cross-Defendant,

CASE NO.: 2:16-cv-00606-JCM-CWH

**STIPULATION AND ORDER TO  
EXTEND TIME FOR CACTUS  
CREEK AT MOUNTAIN'S EDGE  
HOMEOWNERS' ASSOCIATION,  
INC. TO FILE A RESPONSE TO  
THE MOTION TO RECONSIDER  
FILED BY BANK OF AMERICAN,  
N.A. [ECF # 33]**

**(First Request)**

1 PREMIER ONE HOLDINGS, INC.,

2  
3 Counterclaimant,

4 v.

5 BANK OF AMERICA, N.A.,

6 Counterdefendant  
7

8 **STIPULATION AND ORDER TO EXTEND TIME FOR CACTUS CREEK AT**  
9 **MOUNTAIN'S EDGE HOMEOWNERS' ASSOCIATION, INC. TO FILE A RESPONSE**  
10 **TO THE MOTION TO RECONSIDER FILED BY**  
11 **BANK OF AMERICAN, N.A. [ECF # 33]**

12 Pursuant to LR 1A 6-1 and 7-1, Bank of American, N.A., in its own capacity and as  
13 successor by July 1, 2011, de jure merger with BAC Home Loans Servicing, LP f/k/a Countrywide  
14 Home Loans Servicing, LP ("BANA"), Premier One Holdings, LLC ("Premier One"), and Cactus  
15 Creek at Mountains Edge Homeowners Association ("HOA") (collectively the "Parties") stipulate  
16 and agree as follows:  
17

18 On October 4, 2018, BANA filed a motion for reconsideration ("Motion") [ECF #39] of  
19 the court's order [ECF #33] denying summary judgment. Because the HOA's counsel has recently  
20 changed firm names and has been working to make the appropriate filings in all cases, the deadline  
21 to respond to the motion to reconsider was calculated as extending for three weeks rather than two.  
22 In addition, in anticipation of the possibility that counsel may be difficult to reach because of the  
23 Nevada Day holiday on Friday, October 26, 2018, an extension of up to an including October 31,  
24 2018, is necessary in order to afford the HOA the opportunity to adequately respond to the Motion.  
25

26 This stipulation is the first request regarding the HOA's response to the Motion. This  
27 extension is requested in good faith and is not for purposes of delay or prejudice to any other party.  
28

1 WHEREFORE, based on the foregoing, IT IS HEREBY STIPULATED AND AGREED  
2 THAT the deadline for the HOA to file its response to the Motion will be extended from October  
3 18, 2018, to October 31, 2018.

4 DATED this 26<sup>th</sup> day of October, 2018.

DATED this 26th day of October, 2018.

6 **AKERMAN LLP**

**HONG & HONG**

7 By: /s/ William S. Haldas  
8 ARIEL E. STERN, ESQ.  
9 Nevada Bar No. 8276  
10 WILLIAM S. HABDAS, ESQ.  
11 Nevada Bar No. 13138  
12 1160 Town Center Drive, Suite 330  
13 Las Vegas, Nevada 89144

By: /s/ Joseph Y. Hong  
JOSEPH Y. HONG, ESQ.  
Nevada Bar No. 5995  
10781 W. Twain Ave.  
Las Vegas, NV 89135

*Attorney for Premier One Holdings, Inc.*

12 *Attorneys for Plaintiff and Counterclaim-*  
13 *Defendant Bank of America, N.A., as*  
14 *Successor by Merger to BAC Home Loans*  
15 *Servicing, LP f/k/a Countrywide Home Loans*  
16 *Servicing, LP*

16 DATED this 26th day of October, 2018.

17 **ROBBINS LAW FIRM**

18 By: /s/ Elizabeth B. Lowell  
19 Robert T. Robbins, Esq. (NVB 6109)  
20 Elizabeth Lowell, Esq. (NVB 8551)  
21 1995 Village Center Cir., Suite 190  
22 Las Vegas, NV 89134

21 *Attorneys for the HOA*

22 **ORDER**

23 IT IS SO ORDERED.

24 DATED this 26<sup>th</sup> day of October, 2018.

25  
26  
27   
28 **U.S. DISTRICT COURT JUDGE**